

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

ABIRA MEDICAL LABORATORIES,	§	
LLC d/b/a GENESIS DIAGNOSTICS	§	
	§	
vs.	§	CIVIL ACTION NO. 2:20-CV-04317
	§	
MARIA J. KARIM	§	

DEFENDANT’S RULE 26(a)(1) INITIAL DISCLOSURES

Defendant **MARIA J. KARIM** (the “Defendant”) submits its Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rule of Civil Procedure, and shows as follows:

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE:

Maria J. Karim	Defendant
3816 McRee Avenue	
St. Louis, Missouri 63110	

Tessler Brown	Witness
900 Town Center Drive, Suite H50	
Langhorne, Pennsylvania 19047	
(267) 212-2000	

Mr. Brown’s subject of the information would be the scope and extent of communication with Defendant.

Harry Myles	Witness
900 Town Center Drive, Suite H50	
Langhorne, Pennsylvania 19047	
(267) 212-2000	

Mr. Myles' subject of information would be the scope and extent of communication with Defendant.

Kevin Rox
900 Town Center Drive, Suite H50
Langhorne, Pennsylvania 19047
(267) 212-2000

Witness

Mr. Rox's subject of information would be the scope and extent of communication with Defendant.

Defendant reserves the right to amend and/or supplement this disclosure.

2. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE: Defendant identifies the following categories of non-privileged documents which are in the possession of the Defendant and/or its counsel of record in this case.

1. Emails and correspondence.
2. All documents identified and/or produced by any other party to this case.

Defendant reserves the right to amend and/or supplement this disclosure.

3. A computation of each category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE: The defendant is continuing to assess its damages and will supplement this response.

4. Make available for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: Defendant does not have any documents relevant to this disclosure.

DATED: March 30, 2021

SABIR LAW GROUP

By: Ejaz A. Sabir, Esquire

Attorney ID #92147

6454 Market Street,

Upper Darby, PA 19082

610-713-9000

610-713-9500 (fax)

Signature: /S/Ejaz Sabir _

Date: 03/30/2021

COUNSEL FOR PLAINTIFF,
MARIA J. KARIM

CERTIFICATE OF SERVICE

I, Ejaz Sabir, Esquire, certify that a true and correct copy of the Defendant's foregoing Rule 26(a)(1) Initial Disclosures has been filed electronically this 30th day of March, 2021 with the Clerk of Court using the CM/ECF system, which will send notification of such notice to all counsel of record, indicated below:

Severed to:

David W. Ghisalbert

ID No. 328556

2000 Bering Drive, Suite 700

Houston, Texas 77057

(713) 808-9697 [telephone]

(713) 893-6942 [facsimile]

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COUNSEL FOR PLAINTIFF,
ABIRA MEDICAL LABORATORIES, LLC
D/B/A GENESIS DIAGNOSTICS

SABIR LAW GROUP
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Signature: /S/Ejaz Sabir _
Date: 03/30/2021